

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANA JARVIS, *et al*,

Defendants.

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Cause No. 05-CR-1849-JH

UNOPPOSED MOTION BY DEFENDANT GREG HILL
TO MODIFY CONDITIONS OF RELEASE

DEFENDANT GREG HILL, by his undersigned counsel Kari Converse, hereby moves the Court for an Order Modifying his conditions of release. Pretrial Services Probation Officer Mark Cofner and Assistant United States Attorney James Braun have no objection to the requested modification.

The modifications proposed are to eliminate the requirement of ankle bracelet monitoring, and to permit Mr. Hill to travel to the northern district of Indiana upon advance notice to his probation officer.

As grounds therefor, Mr. Hill would state as follows:

1. Mr. Hill traveled on his own to New Mexico from Indiana to obtain counsel and to present himself in court for his arraignment on September 1, 2005.
2. At that time conditions of release set for him in Indiana at his initial appearance there were continued (Doc. 169). These conditions included ankle bracelet monitoring and restricting his travel to the Southern District of Indiana.
3. Mr. Hill has complied fully with conditions of pretrial release and has kept in very

frequent contact with his counsel as well.

4. Probation Officer Mark Cofner believes that ankle bracelet monitoring is no longer necessary, and recommends that Mr. Hill be allowed to travel freely within the state of Indiana, in order to visit his aging father who lives in the Northern District. AUSA Braun has no objection to releasing Mr. Hill from ankle bracelet monitoring, and has no objection to Mr. Hill traveling to northern Indiana, so long as he advises his probation officer in advance of such trips.

WHEREFORE, Mr. Hill respectfully requests that this Court enter an order modifying conditions of release, eliminating the need for electronic monitoring and restricting travel to the Southern District of Indiana, with other conditions to remain in force. A proposed form of Order accompanies this motion.

Respectfully submitted,

electronically filed

KARI CONVERSE

Attorney for Mr. Hill

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2006, a true and correct copy of the foregoing Unopposed Motion to Modify Conditions of Release was served on James Braun, AUSA, P.O. Box 607, Albuquerque, New Mexico, 87103, fax 346-7296.

electronically filed

Kari Converse